

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX Trading LTD., *et al.*,¹

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD. and MACLAURIN
INVESTMENTS LTD.,

Plaintiffs,

-against-

Adv. Pro. No. 23-50437 (JTD)

PATRICK GRUHN, ROBIN MATZKE, LOREM
IPSUM UG, and BRANDON WILLIAMS,

Defendants.

**STIPULATION REGARDING EXTENSION
OF DEFENDANTS' RESPONSE DEADLINE**

This *Stipulation Regarding Extension of Defendants' Response Deadline* (this “**Stipulation**”) is made as of August 9, 2023, by and among, FTX Trading Ltd. (“**FTX**”) and Maclaurin Investments Ltd. (“**MacLaurin**,” and with FTX, “**Plaintiffs**”), on the one hand, and Patrick Gruhn (“**PG**”), Robin Matzke (“**RM**”), Lorem Ipsum UG (“**LIUG**”), and Brandon Williams (“**BW**,” and with PG, RM, and LIUG, “**Defendants**”), on the other hand.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

RECITALS

WHEREAS, on July 12, 2023, Plaintiffs filed the *Complaint for Avoidance and Recovery of Transfers and Obligations Pursuant to 11 U.S.C. §§ 105, 547, 548, and 550, Breach of Fiduciary Duty Pursuant to Antiguan Common Law and the Antigua International Business Corporations Act, and for Disallowance of Claims Pursuant to 11 U.S.C. § 502(D)* (“**Complaint**”) in the above-captioned adversary proceeding against the Defendants.

WHEREAS, Plaintiffs served the Complaint on PG and BW by first-class mail dated July 13, 2023.

WHEREAS, pursuant to rule 7015(a)(3) of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rules**”), the deadline for the served Defendants to answer, move, or otherwise respond to the Complaint is August 14, 2023 (“**Response Deadline**”).

WHEREAS, the Plaintiffs and the Defendants (each a “**Party**” and collectively, “**Parties**”) are negotiating a case management plan and scheduling order (“**Case Management Plan**”) that will include a response deadline for all defendants and a waiver of service of process (while preserving any jurisdictional defenses) by the non-served defendants.

WHEREAS, Plaintiffs have consented to the served Defendants’ request for an extension in the interim, as set forth herein, such that the Response Deadline shall be extended to and including September 11, 2023.

NOW, THEREFORE, in consideration of the foregoing recitals and the mutual promises hereinafter contained, the Parties, intending to be legally bound, hereby stipulate and agree as follows:

STIPULATION

1. The Parties agree that notwithstanding anything to the contrary in the Bankruptcy Rules, the Response Deadline is hereby extended to and including September 11, 2023, which may be further extended by order of the Bankruptcy Court.
2. The Parties agree to submit a proposed Case Management Plan to the Bankruptcy Court, whether jointly or with alternative contested provisions, by August 24, 2023.
3. The Bankruptcy Court has and retains jurisdiction to resolve any disputes or controversies arising from, in connection with, or related to this Stipulation.
4. Nothing herein shall be a waiver of any jurisdictional defenses by any Defendants.

[Signature Pages Immediately Follow]

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